

**BEFORE THE  
ILLINOIS COMMERCE COMMISSION**

\_\_\_\_\_  
In the Matter of )  
)  
)

**Looking Glass Networks, Inc.** )  
)

Docket No.: 00-0343

Application For a Certificate of Local and )  
Interexchange Authority to Operate as a )  
Facilities-based Carrier of Telecommunications )  
Services Throughout the State of Illinois )  
\_\_\_\_\_ )

**PRE-FILED TESTIMONY OF JODI CARO  
ON BEHALF OF  
LOOKING GLASS NETWORKS, INC.**

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Dated: June 9, 2000

**OFFICIAL FILE**

I.C.C. DOCKET NO. 00-0343

Appl Exhibit No. 1

Witness \_\_\_\_\_

Date 6/14/00 Reporter CAS

1    **I.     INTRODUCTION**

2    **Q.     PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TELEPHONE**  
3       **AND FAX NUMBERS.**

4    **A.**    My name is Jodi Caro. My business address is 18 W. 140 Butterfield Road, 16<sup>th</sup> Floor,  
5       Oakbrook Terrace, Illinois 60181. My business telephone number is (630) 242-2000, and  
6       my fax number is (630) 242-2001.

7    **Q.     WHAT IS YOUR POSITION WITH LOOKING GLASS NETWORKS, INC.**  
8       **("LGN" or "APPLICANT")?**

9    **A.**    I am LGN's Vice President, General Counsel, and Assistant Secretary.

10   **Q.     WHAT ARE YOUR RESPONSIBILITIES IN THESE POSITIONS?**

11   **A.**    I am responsible for handling legal and regulatory matters for LGN.

12   **Q.     PLEASE BRIEFLY DESCRIBE YOUR PREVIOUS PROFESSIONAL**  
13       **EXPERIENCE AND QUALIFICATIONS.**

14   **A.**    Before I joined LGN, I was an in-house attorney with MCI WorldCom, Inc. In 1993, I  
15       joined MCI WorldCom's predecessor company, MFS Communications, where I initially  
16       provided legal support to the Sales and Network Development Department. In this  
17       capacity, I provided legal advice on all aspects of customer and carrier sales, network  
18       development, and construction matters. In December 1993, I became Counsel for  
19       Development and focused on legal issues associated with the development, construction,  
20       engineering, and operations of local fiber optic networks.

21           After the merger of WorldCom and MFS in December 1996, my duties were  
22       expanded to include support of long distance, technology, and network procurement

1 matters. Similarly, after WorldCom merged with MCI, I began providing primary legal  
2 support for building access and collocation in addition to my network and procurement  
3 duties. I also provided legal support for MCI WorldCom's undersea cable projects.

4 I have counseled municipalities and governmental agencies in the United States  
5 and internationally on rights-of-way matters. I have been a member of the National  
6 Association of Telecommunications Officers and Advisors, the International Right-of-  
7 Way Association, the Federal Communications Bar Association, and various state and  
8 national bar associations. Prior to entering the telecommunications industry, I was an  
9 Associate General Counsel at Convenient Food Mart, Inc. in Chicago. I received my  
10 Bachelor of Arts degree from Marquette University and my law degree from Chicago-  
11 Kent College of Law.

12 **Q. HAVE YOU TESTIFIED BEFORE THE ILLINOIS COMMERCE COMMISSION**  
13 **(“COMMISSION”) PREVIOUSLY?**

14 **A.** No.

15 **Q. IS LGN CURRENTLY CERTIFICATED TO PROVIDE SERVICE IN**  
16 **ILLINOIS?**

17 **A.** No.

18 **Q. IS LGN LEGALLY AUTHORIZED TO DO BUSINESS IN ILLINOIS?**

19 **A.** Yes. A copy of LGN's Certificate of Authority to Transact Business in the State of  
20 Illinois was submitted to the Commission as Exhibit 2 of its Application.

21 **Q. ARE YOU FAMILIAR WITH THE APPLICATION LGN SUBMITTED TO THE**  
22 **COMMISSION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND**

1        **NECESSITY TO PROVIDE COMPETITIVE TELECOMMUNICATIONS**  
2        **SERVICES WITHIN THE STATE OF ILLINOIS ("APPLICATION") ?**

3        A.    Yes.

4        Q.    **DO YOU HAVE ANY CHANGES OR UPDATED INFORMATION TO PROVIDE**  
5        **REGARDING THE APPLICATION?**

6        A.    No.

7        Q.    **ARE THERE ANY OTHER CHANGES OF WHICH THE COMMISSION**  
8        **SHOULD BE AWARE?**

9        A.    No.

10      Q.    **DO YOU RATIFY AND CONFIRM THE STATEMENTS THAT ARE MADE IN**  
11      **LGN'S APPLICATION?**

12      A.    Yes.

13      **II.    PURPOSE AND SUMMARY**

14      Q.    **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15      A.    The purpose of my testimony is to describe LGN and the services it proposes to offer in  
16      Illinois. In addition, I will demonstrate that LGN possesses the financial, technical,  
17      managerial and operational capabilities to operate as a provider of telecommunications  
18      services within the State of Illinois.

19      Q.    **PLEASE DESCRIBE THE CORPORATE STRUCTURE OF LGN.**

20      A.    LGN is a corporation organized under the laws of the State of Delaware and is a wholly-  
21      owned subsidiary of Looking Glass Networks, LLC, a Delaware corporation.

22      Q.    **HOW MANY EMPLOYEES DOES LGN HAVE?**

1    **A.**    As of June 9, 2000, LGN has 22 employees.

2    **Q.**    **PLEASE DESCRIBE THE AUTHORITY THAT LGN SEEKS BY ITS**  
3           **APPLICATION.**

4    **A.**    LGN seeks a Certificate of Local and Interexchange Authority to Operate as a Facilities-  
5           Based Carrier of Telecommunications Services throughout the State of Illinois. Initially,  
6           however, LGN only intends to provide dedicated and private line fiber optic  
7           telecommunications transmission capacity.

8    **Q.**    **HAS LGN OBTAINED SUCH AUTHORITY FROM OTHER JURISDICTIONS?**

9    **A.**    No. LGN is a new company and has only just begun to seek authority to provide  
10          telecommunications services. In addition to Illinois, LGN has applications to provide  
11          telecommunications service pending in California, the District of Columbia, Florida,  
12          Georgia, Massachusetts, New Jersey, New York and Texas.

13   **Q.**    **HAS ANY STATE EVER DENIED LGN AUTHORIZATION TO PROVIDE**  
14          **INTRASTATE SERVICE?**

15   **A.**    No.

16   **Q.**    **HAS ANY STATE EVER REVOKED LGN'S CERTIFICATION?**

17   **A.**    No.

18   **Q.**    **HAS YOUR COMPANY PROVIDED SERVICE UNDER ANY OTHER NAME?**

19   **A.**    No.

20   **Q.**    **HAVE ANY COMPLAINTS OR JUDGMENTS BEEN LEVIED AGAINST THE**  
21          **COMPANY? (INSTATE, OUT-OF-STATE, OR FCC).**

1 A. To my knowledge, no complaints or court judgments have been levied with any  
2 regulatory body against LGN.

3 Q. HAS THE COMPANY EVER BEEN INVESTIGATED OR SANCTIONED BY  
4 ANY REGULATORY AUTHORITY FOR SERVICE OR BILLING  
5 IRREGULARITIES?

6 A. No.

7 **III. MANAGERIAL AND TECHNICAL QUALIFICATIONS**

8 Q. PLEASE ADDRESS LGN'S MANAGERIAL AND TECHNICAL QUALIFICA-  
9 TIONS.

10 A. LGN's officers have extensive managerial, financial, and technical telecommunications  
11 experience and, therefore, are well qualified to execute its business plan. Descriptions of  
12 the telecommunications and managerial experience of LGN's key personnel were  
13 attached as Exhibit 3 to LGN's Application. These descriptions demonstrate that LGN's  
14 personnel have a broad range of experience in successfully managing and operating  
15 telecommunications carriers. Accordingly, LGN has the technical and managerial  
16 resources necessary to provide customers in the State of Illinois with high-quality,  
17 dependable, telecommunications services.

18 **IV. FINANCIAL QUALIFICATIONS**

19 Q. PLEASE DESCRIBE LGN'S FINANCIAL QUALIFICATIONS.

20 A. LGN is financially qualified to provide telecommunications services in the State of  
21 Illinois. LGN has been financed with approximately \$5 million to fund its initial start-up  
22 phase. In addition, LGN has a financial commitment from Madison Dearborn Capital

1 Partners, L.P. and its affiliates to provide additional financing up to an aggregate amount  
2 of more than \$194 million. Copies of LGN's financial statements were attached as  
3 Exhibit 4 to its Application.

4 **V. LGN'S PROPOSED SERVICES**

5 **Q. PLEASE DESCRIBE THE TYPES OF SERVICES THAT LGN PLANS TO**  
6 **OFFER IN ILLINOIS.**

7 **A.** LGN proposes to construct a non-switched fiber optic SONET ring around the Chicago  
8 metropolitan area. Accordingly, Applicant seeks authority to provide non-switched  
9 dedicated and private line, high capacity fiber optic transmission services ("lit" and  
10 "dim" fiber services) as well as dedicated and private line access services throughout the  
11 State of Illinois to enable its customers to obtain, on a fixed rate basis, fiber optic  
12 transmission capacity in developing their own networks. Applicant intends to offer its  
13 fiber optic transmission services to carriers, such as incumbent local exchange carriers  
14 ("ILECs"), competitive local exchange carriers ("CLECs"), and Internet service  
15 providers ("ISPs"). In addition, corporate and government customers will be able to  
16 purchase fiber optic broadband transmission services on a point-to-point basis for high-  
17 bandwidth, secure voice and data networks.

18 The advanced technical characteristics of LGN's network will provide the high  
19 levels of reliability, security, and capacity that its target customers typically demand. The  
20 network will be capable of using the highest commercially available capacity  
21 transmission (OC-192) and, therefore, will support advanced capacity-intensive data  
22 applications such as frame relay, ATM, multimedia, and Internet-related applications.

1    **Q.    DOES LGN PROPOSE TO OFFER OPERATOR SERVICES?**

2    **A.    No.**

3    **Q.    PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH**  
4       **LGN'S PROPOSED OFFERINGS OF INTRASTATE TELECOMMUNICATIONS SERVICES**  
5       **IN ILLINOIS.**

6    **A.    LGN's entry into the Illinois telecommunications market will serve the public interest by**  
7       **creating greater competition in the telecommunications marketplace. LGN's proposed**  
8       **intrastate services will enhance the services already available to consumers as well as**  
9       **increase the availability of service options. In addition, LGN's presence will increase the**  
10      **incentives for other telecommunications providers to operate more efficiently, reduce**  
11      **prices, and offer more innovative services.**

12   **VI.    COMPLIANCE WITH THE COMMISSION'S RULES, REGULATIONS AND**  
13      **POLICIES**

14   **Q.    IF AUTHORIZED TO PROVIDE COMPETITIVE TELECOMMUNICATIONS**  
15      **SERVICES, WILL LGN ABIDE BY THE RULES, REGULATIONS, POLICIES**  
16      **AND ORDERS OF THIS COMMISSION AND THE LAWS OF THE STATE OF**  
17      **ILLINOIS IN ITS PROVISION OF COMPETITIVE INTRASTATE LOCAL**  
18      **EXCHANGE AND INTEREXCHANGE SERVICES?**

19   **A.    Yes. LGN will provide service in the State in full compliance with any and all rules and**  
20      **regulations that have been or may be adopted relating to the provision of local exchange**  
21      **and interexchange services, as well as any other applicable state or federal rules,**  
22      **regulations, or statutes, except to the extent that the Commission has granted LGN a**



1 waiver any Commission rules and regulations. For example, LGN will comply with any  
2 competitively-neutral requirements that the Commission and/or the State of Illinois  
3 determines are necessary to preserve and advance universal service, protect the public  
4 safety and welfare, ensure the continued quality of local services, and safeguard the rights  
5 of consumers. LGN also will comply with all statutory and Commission requirements  
6 concerning the filing of tariffs, customer notification of rate increases, customer billing  
7 and credit issues, and the filing of regulatory reports and the payment of regulatory  
8 assessments.

9 **Q. PLEASE PROVIDE THE NAME, ADDRESS, AND TELEPHONE AND FAX**  
10 **NUMBERS OF THE 9-1-1 CONTACT PERSON FOR YOUR COMPANY.**

11 **A.** Initially, LGN intends to only offer high speed transmission services and will not offer  
12 service to end-user customers. To the extent that the Commission determines that this  
13 requirement is applicable to LGN, Applicant will comply with this requirement and  
14 provide the name, address and telephone and fax numbers of a 9-1-1 contact at LGN.

15 **Q. WILL YOUR COMPANY ENSURE THAT 9-1-1 TRAFFIC IS HANDLED IN**  
16 **ACCORDANCE WITH THE 83 ILLINOIS ADMINISTRATIVE CODE PART 725**  
17 **AND THE EMERGENCY TELEPHONE SYSTEM ACT?**

18 **A.** Initially, LGN intends to only offer high speed transmission services and will not offer  
19 service to end-user customers. To the extent that the Commission determines that this  
20 requirement is applicable to LGN, Applicant will comply with this requirement. At this  
21 time, however, LGN respectfully requests a waiver of 83 Illinois Administrative Code  
22 Part 725 and the Emergency Telephone System Act.

1   **Q.   WILL YOUR COMPANY CONTACT AND ESTABLISH A WORKING**  
2       **RELATIONSHIP WITH 9-1-1 SYSTEMS WHEN YOU BEGIN TO PROVIDE**  
3       **LOCAL TELEPHONE SERVICE?**

4   **A.**   Initially, LGN intends to only offer high speed transmission services and will not offer  
5       service to end-user customers. To the extent that the Commission determines that this  
6       requirement is applicable to LGN, Applicant will comply with this requirement.

7   **Q.   WILL YOUR COMPANY COORDINATE WITH THE INCUMBENT LEC(S)**  
8       **AND LOCAL 9-1-1 SYSTEMS TO PROVIDE TRANSPARENT SERVICE FOR**  
9       **YOUR LOCAL EXCHANGE CUSTOMERS?**

10  **A.**   Initially, LGN intends to only offer high speed transmission services and will not offer  
11       service to end-user customers. To the extent that the Commission determines that this  
12       requirement is applicable to LGN, Applicant will comply with this requirement.

13  **Q.   WHO WILL BE RESPONSIBLE FOR BUILDING AND MAINTAINING THE**  
14       **9-1-1 DATA BASE FOR YOUR LOCAL EXCHANGE CUSTOMERS?**

15  **A.**   Initially, LGN intends to only offer high speed transmission services and will not offer  
16       service to end-user customers. To the extent that the Commission determines that this  
17       requirement is applicable to LGN, Applicant will comply with this requirement.

18  **Q.   HOW OFTEN WILL YOUR COMPANY UPDATE THE 9-1-1 DATABASE WITH**  
19       **CUSTOMER INFORMATION?**

20  **A.**   Initially, LGN intends to only offer high speed transmission services and will not offer  
21       service to end-user customers. To the extent that the Commission determines that this  
22       requirement is applicable to LGN, Applicant will comply with this requirement.

1 Q. WILL YOUR COMPANY'S BILLING SYSTEM HAVE THE ABILITY TO  
2 DISTINGUISH BETWEEN FACILITIES BASED AND RESALE FOR THE  
3 COLLECTION OF THE 9-1-1 SURCHARGE AND ILLINOIS TELE-  
4 COMMUNICATIONS ACCESS CORPORATION LINE CHARGE?

5 A. Initially, LGN intends to only offer high speed transmission services and will not offer  
6 service to end-user customers. To the extent that the Commission determines that this  
7 requirement is applicable to LGN, Applicant will comply with this billing systems  
8 requirement.

9 Q. DOES YOUR COMPANY HAVE PROCEDURES FOR THE TRANSITIONING  
10 OF THE 9-1-1 SURCHARGE COLLECTION AND DISBURSEMENT TO THE  
11 LOCAL 9-1-1 SYSTEM?

12 A. Initially, LGN intends to only offer high speed transmission services, and will not offer  
13 service to end-user customers. To the extent that the Commission determines that this  
14 requirement is applicable to LGN, Applicant will create procedures for the transitioning  
15 of the 9-1-1 surcharge collection and disbursement to the local 9-1-1 system.

16 Q. WILL YOUR COMPANY'S PROPOSAL REQUIRE ANY NETWORK  
17 CHANGES TO ANY OF THE 9-1-1 SYSTEMS?

18 A. No.

19 Q. WILL YOUR COMPANY COMPLY WITH 83 ILLINOIS ADMINISTRATIVE  
20 CODE PART 705, PRESERVATION OF RECORDS OF TELEPHONE  
21 UTILITIES?

1 A. Yes. LGN will comply with the regulations imposed on LECs concerning the  
2 preservation of records.

3 **Q. PLEASE EXPLAIN LGN'S REQUEST FOR A WAIVER FROM PART 710.**

4 A. Part 710 requires compliance with the Uniform System of Accounts ("USOA"). While  
5 this provision is appropriately applied to incumbent LECs that have market power, it  
6 imposes unnecessary and burdensome requirements on new entrants that are inconsistent  
7 with a competitive environment. LGN's size and lack of market power are special  
8 circumstances that warrant a waiver of the USOA requirement. LGN keeps its books in  
9 accordance with Generally Accepted Accounting Principles ("GAAP"), which will result  
10 in a substantially equivalent portrayal of its operating results and financial condition as  
11 the USOA and will maintain uniformity in the substantive results as among  
12 telecommunications companies. Finally, it is my understanding that the Commission has  
13 waived Part 710 for other competitive carriers, including MFS Intelenet of Illinois, Inc.  
14 (Docket No. 93-0409) and MCI Metro Access Transmission Services, Inc. (Docket No.  
15 94-0400). LGN seeks the same treatment with the understanding that the requested  
16 waiver of Part 710 will not excuse it from compliance with future Commission rules or  
17 amendments to Part 710 otherwise applicable and that LGN will provide annual audited  
18 statements.

19 **Q. WILL YOUR COMPANY BE ABLE TO MEET THE REQUIREMENTS**  
20 **SPECIFIED UNDER PART 725.500(o) AND 725.620(b) FOR THE**  
21 **INSTALLATION OF CALL BOXES?**

1 A. Sections 725.500(o) and 725.620(b) require that call boxes be installed at a local  
2 exchange carrier's ("LEC") switch in order to allow a Public Safety Answering Point  
3 ("PSAP") employee to field 9-1-1 calls from that switch in the event of a trunking  
4 problem between the central office and the PSAP. Initially, LGN intends to only offer  
5 high speed transmission services and will not offer service to end-user customers.  
6 Therefore, LGN respectfully requests a waiver of Part 725.

7 Q. WILL YOUR COMPANY ABIDE BY 83 ILLINOIS ADMINISTRATIVE CODE  
8 PART 735, "PROCEDURES GOVERNING THE ESTABLISHMENT OF  
9 CREDIT, BILLING, DEPOSITS, TERMINATION OF SERVICE AND  
10 ISSUANCE OF TELEPHONE DIRECTORIES FOR TELEPHONE UTILITIES IN  
11 THE STATE OF ILLINOIS"?

12 A. Initially, LGN intends to only offer high speed transmission services, and will not offer  
13 service to end-user customers. Accordingly, LGN has requested a waiver of Part 735 or,  
14 in the alternative, an exemption from Part 735.180, which requires the publication of  
15 telephone directories. As stated previously, LGN will not offer service, at least initially,  
16 to end users. However, to the extent that the Commission requires compliance with the  
17 requirements of Part 735, LGN will comply with those requirements.

18 Q. PLEASE EXPLAIN LGN'S REQUEST FOR A VARIANCE FROM 83 ILL. ADM.  
19 CODE PART 735.180.

20 A. LGN seeks a variance of Part 735.180, which requires LECs to publish and distribute  
21 directories to their customers. As stated above, LGN does not plan to offer dial-tone  
22 service to end users. To the extent that LGN later offers voice service to end users, LGN

1 will negotiate an agreement with other local exchange providers, pursuant to which those  
2 carriers will include LGN's customer listings in their directories and distribute them to  
3 LGN's customers.

4 **Q. WILL YOUR COMPANY ABIDE BY THE REGULATIONS AS PRESCRIBED**  
5 **IN 83 ILLINOIS ADMINISTRATIVE CODE PART 755, "TELE-**  
6 **COMMUNICATIONS ACCESS FOR PERSONS WITH DISABILITIES," 83**  
7 **ILLINOIS ADMINISTRATIVE CODE PART 756 "TELECOMMUNICATIONS**  
8 **RELAY SERVICE," AND SECTIONS 13-703 OF THE ILLINOIS PUBLIC**  
9 **UTILITIES ACT?**

10 **A.** Initially, LGN intends to only offer high speed transmission services, and will not offer  
11 service to end-user customers. Therefore, LGN has respectfully requested waivers of 83  
12 Illinois Administrative Code Parts 755 and 756.

13 **Q. WILL YOUR COMPANY MEET THE REQUIREMENTS AS THEY PERTAIN**  
14 **TO THE TELEPHONE ASSISTANCE PROGRAMS IMPOSED BY SECTIONS**  
15 **13.301 AND 13.301.1 OF THE ILLINOIS PUBLIC UTILITIES ACT AND 83**  
16 **ILLINOIS ADMINISTRATIVE CODE PART 757?**

17 **A.** Yes, to the extent applicable, LGN will meet the requirements of the Illinois telephone  
18 assistance programs.

19 **Q. WILL LGN COMPLY WITH THE COMMISSION'S RULES CONCERNING**  
20 **THE UNIVERSAL SERVICE OBLIGATIONS OF LOCAL EXCHANGE**  
21 **CARRIERS, INCLUDING REGULATIONS CONCERNING CONTRIBUTIONS**

1       **TO THE UNIVERSAL TELEPHONE ASSISTANCE CORPORATION**  
2       **("UTAC")?**

3    **A.**    Yes. LGN will comply with Part 757 of the Illinois Administrative code regarding the  
4       Universal Service obligations of local exchange carriers. In particular, LGN will  
5       contribute to the UTAC in adherence with the rules governing the solicitation and  
6       remittance of contributions and the filing of reports with the Commission. Furthermore,  
7       LGN will comply with all rules and requirements imposed on LECs, as now adopted or  
8       as may be adopted in the future in order to bear its fair share of responsibility as a LEC.

9    **Q.    WILL YOUR COMPANY COMPLY WITH 83 ILLINOIS ADMINISTRATIVE**  
10       **CODE PART 770, OPERATOR SERVICE PROVIDERS?**

11   **A.**    Initially, LGN intends to only offer high speed transmission services, and will not offer  
12       service to end-user customers, including access to operator service providers.  
13       Accordingly, LGN requests a waiver of Part 770. To the extent that the Commission  
14       determines that Part 770 is applicable to LGN's proposed service offerings, LGN will  
15       comply with Part 770.

16   **Q.    WILL YOUR COMPANY COMPLY WITH 83 ILLINOIS ADMINISTRATIVE**  
17       **CODE PART 772, PAY-PER-CALL SERVICES, INCLUDING PART 772.55(a)(1),**  
18       **BILLING AND PART 772.100(d) NOTICES?**

19   **A.**    Initially, LGN intends to only offer high speed transmission services, and will not offer  
20       service to end-user customers, including access to pay-per-call services. Accordingly,  
21       LGN requests a waiver of Part 772. If in the future, LGN wishes to provide these  
22       services, it will abide by 83 Illinois Administrative Code Part 772, including Part

1 772.55(a)(1) and Part 772.100(d). Additionally, to the extent the Commission determines  
2 that Part 772 is applicable to LGN's proposed offerings, LGN will comply with Part 772.

3 **Q. HAS YOUR COMPANY SIGNED AND RETURNED THE UNIVERSAL**  
4 **TELEPHONE ASSISTANCE CORPORATION ("UTAC") AND THE ILLINOIS**  
5 **TELECOMMUNICATIONS ACCESS CORPORATION ("ITAC") TO**  
6 **COMMISSION STAFF?**

7 **A.** No. LGN will return the UTAC and ITAC prior to providing local exchange services in  
8 Illinois.

9 **Q. WILL YOUR COMPANY SOLICIT, COLLECT, AND REMIT THE**  
10 **VOLUNTARY CONTRIBUTIONS FROM ITS TELEPHONE SUBSCRIBERS TO**  
11 **SUPPORT THE TELEPHONE ASSISTANCE PROGRAMS?**

12 **A.** Yes.

13 **Q. DOES YOUR COMPANY PLAN TO OBTAIN ELIGIBLE TELE-**  
14 **COMMUNICATIONS CARRIER STATUS TO QUALIFY FOR THE**  
15 **FEDERALLY FUNDED LIFELINE AND LINK UP PROGRAMS?**

16 **A.** At this time, LGN does not intend to seek designation as an Eligible Telecommunications  
17 Carrier and realizes it will not qualify to receive any federal reimbursements for these  
18 programs.

19 **Q. WILL YOUR COMPANY OFFER ALL OF THE WAIVERS ASSOCIATED**  
20 **WITH THE UNIVERSAL TELEPHONE SERVICE ASSISTANCE PROGRAMS**  
21 **(UTSAP)?**



1 A. Initially, LGN intends to only offer high speed transmission services, and will not offer  
2 service to end-user customers. However, to the extent that the Commission requires  
3 LGN to offer the waivers associated with the Universal Service Telephone Assistance  
4 Program (UTSAP), LGN will comply.

5 **Q. WHO WILL PROVIDE CUSTOMER REPAIR SERVICE FOR YOUR**  
6 **COMPANY?**

7 A. LGN's customers may call its toll-free customer service number during regular business  
8 hours to register service and billing complaints. The toll-free number is (877) 881-8890.

9 **Q. WILL LGN HAVE ANY REPAIR PERSONNEL LOCATED IN THE STATE OF**  
10 **ILLINOIS?**

11 Yes. LGN will have technical and repair staff located at its main office in Oakbrook  
12 Terrace, Illinois.

13 **Q. PLEASE DESCRIBE YOUR COMPANY'S INTERNAL PROCESS FOR**  
14 **COMPLAINT RESOLUTION, THE ESCALATION PROCESS WITHIN YOUR**  
15 **COMPANY, AND WHEN A CUSTOMER IS NOTIFIED THAT THEY MAY**  
16 **CONTACT THE ILLINOIS COMMERCE COMMISSION FOR ASSISTANCE.**

17 A. LGN will maintain a toll-free customer service number that customers may call during  
18 regular business hours to register complaints. The customers' bills will include this toll  
19 free number and an address to which inquiries may be addressed. Resolution and/or  
20 escalation of customer service complaints will be handled in conformity with applicable  
21 Commission regulations and LGN's tariffs. Customers will be notified that they may  
22 contact the Illinois Commerce Commission for assistance.

1    **Q.    PLEASE PROVIDE THE NAME, ADDRESS, AND TELEPHONE AND FAX**  
2           **NUMBERS OF THE PERSON IN YOUR COMPANY WHO WILL BE**  
3           **RESPONSIBLE FOR WORKING WITH THE COMMISSION'S CONSUMER**  
4           **SERVICES DIVISION FOR COMPLAINT RESOLUTION.**

5    **A.**    Complaint resolution will be handled, at least initially, by Jodi J. Caro, Vice President  
6           and General Counsel of Looking Glass Networks, Inc. Ms. Caro's business mailing  
7           address is 18 W. 140 Butterfield Road, 16<sup>th</sup> Floor, Oakbrook Terrace, Illinois 60181.  
8           Ms. Caro's business fax number is (630) 242-2001.

9    **Q.    WILL THE COMPANY FILE TARIFFS FOR ALL SERVICES AND CHARGES**  
10           **ASSOCIATED WITH PROVIDING LOCAL TELEPHONE SERVICE,**  
11           **INCLUDING SPECIFIC PROGRAMS, E.G., 9-1-1, UTAC, AND ITAC?**

12   **A.**    Yes. LGN will file a final local exchange tariff after certification and prior to the  
13           initiation of local exchange service in Illinois. The tariff will set forth provisions for all  
14           of its local service offerings.

15   **Q.    HOW DOES YOUR COMPANY PLAN TO SOLICIT CUSTOMERS ONCE IT**  
16           **BEGINS TO PROVIDE LOCAL SERVICE?**

17   **A.**    LGN will use direct marketing methods in order to market its service to business  
18           customers.

19   **Q.    WILL YOUR COMPANY ABIDE BY FEDERAL AND STATE SLAMMING**  
20           **LAWS?**

21   **A.**    Yes. LGN will comply with Illinois law and the Federal Communications Commission's  
22           regulations regarding how carriers may change a consumer's primary carrier.

1 Q. HAS YOUR COMPANY WRITTEN GUIDELINES TO PREVENT THE  
2 UNAUTHORIZED SLAMMING OF LOCAL EXCHANGE?

3 A. LGN will establish internal sales and management procedures to ensure that its customers  
4 have affirmatively selected LGN as their service provider to the extent that LGN offers  
5 presubscription services. All Orders requesting LGN as the Preferred Carrier must be  
6 requested in the form of a signed Contract or LOA. PIC/PTC change requests from any  
7 other source will not be recognized by LGN.

8 Q. WILL APPLICANT MAINTAIN ITS RECORDS IN SUFFICIENT DETAIL TO  
9 FACILITATE THE CALCULATION OF ALL APPLICABLE TAXES?

10 A. Yes.

11 Q. DOES THE ACCOUNTING SYSTEM CURRENTLY IN USE BY APPLICANT  
12 PROVIDE SUFFICIENTLY DETAILED DATA FOR THE PREPARATION OF  
13 ILLINOIS GROSS RECEIPTS TAX RETURNS? WHAT SPECIFIC ACCOUNTS  
14 OR SUB-ACCOUNTS PROVIDE THIS DATA?

15 A. Yes. LGN will establish a system of accounts that detail income amounts specific to  
16 Illinois (*i.e.*, intrastate v. interstate revenues).

17 Q. THE COMMISSION'S CONSUMER SERVICES DIVISION REQUESTS THAT  
18 CARRIERS THAT ARE CERTIFIED TO PROVIDE LOCAL EXCHANGE  
19 SERVICE NOTIFY THE DIVISION AT LEAST ONE MONTH PRIOR TO THE  
20 ACTIVATION OF LOCAL EXCHANGE SERVICE. WILL LGN SO NOTIFY  
21 THE DIVISION ON A TIMELY BASIS PRIOR TO THE ACTIVATION OF  
22 LOCAL SERVICE?

1   A.    Yes.

2   Q.    **IF GRANTED CERTIFICATION TO PROVIDE LOCAL AND**  
3       **INTEREXCHANGE SERVICE IN ILLINOIS, WILL LGN ABIDE BY THE**  
4       **RULES AND REGULATIONS OF THIS COMMISSION, AS NOW ADOPTED**  
5       **OR THAT MAY BE ADOPTED IN THE FUTURE?**

6   A.    Yes, LGN will comply with all applicable rules and regulations of the Commission, as  
7       now adopted or that may be adopted in the future.

8   Q.    **DOES THIS CONCLUDE YOUR TESTIMONY?**

9   A.    Yes. I reserve the right, however, to amend or modify my testimony, as appropriate.

10                               **END OF TESTIMONY**